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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WILLIAM J. EINHORN, Administrator of
THE TEAMSTERS PENSION TRUST
FUND OF PHILADELPHIA & VICINITY,

Plaintiff,

v.

LIBERTY LOGISTICS, LLC., AMERICAN
HELPER, INC., MARANO TRUCK
SALES & SERVICE, INC., MARANO
TRUCK LEASING CORP., MARANO
NATIONAL TRUCK LEASE CORP.,
MARANO NATIONAL TRUCK LEASING
CORP., CENTURY TRUCK AND
TRAILER, INC., MARANO TRUCK
LEASING CORP., MARANO NATIONAL
TRUCK, INC., DOMINICK C. MARANO,
and MARIAN MARANO,

Defendants.

Case No. 07-cv-04073 (JHR)

STIPULATION AND ORDER OF CONSENT JUDGMENT

Plaintiff, William J. Einhorn, Administrator of the Teamsters Pension Trust Fund of Philadelphia & Vicinity (the "Fund"), and Defendants, Liberty Logistics, LLC ("Liberty"), American Helper, Inc. (American"), Dominic C. Marano and Marian Marano (collectively, the Maranos"), by and through their undersigned attorneys, hereby knowingly and voluntarily

stipulate to the entry of a consent judgment in favor of the Fund, and against Liberty and American, jointly and severally, as follows:

1. Upon the filing and entry of the Stipulation and Order of Consent Judgment, judgment shall be entered in favor of the Fund, and against Liberty and American, jointly and severally, in the total amount of \$653,250.67 (the "Judgment"), which amount is comprised of: (i) withdrawal liability in the amount of \$406,000.80; and (ii) liquidated damages in the amount of \$81,200.16, and delinquent contributions in the amount of \$1,045.80, pre-judgment interest in the amount of \$110,210.66, and attorneys' fees in the amount of \$54,793.25. Post-judgment interest shall continue to accrue on the Judgment at the statutory rate.

2. Judgment shall not be entered against the Maranos pursuant to this Stipulation and the Maranos shall be granted an extension of time until December 31, 2007 to file an answer to the Complaint.

3. The Fund and the Defendants stipulate and agree that Century Truck and Trailer, Inc. ("Century") shall be dismissed, without prejudice, as a party to this litigation and, accordingly, Century shall be removed from the caption.

4. This Stipulation shall not impact the otherwise affect the rights and obligations of the remaining Defendants to this litigation.

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A PA Professional Corporation

By 

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Attorneys for Defendants

SO ORDERED THIS


day of

January, 2008.